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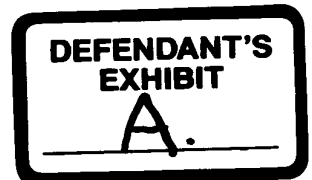
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Declaration of Mr. ALAWI M. SAEED KAMEL

I, Mr. ALAWI M. SAEED KAMEL declare and state as follows:

1. I am over 18 years of age and competent to testify to the matters set forth below of my own personal knowledge.
2. I have been informed by DALLAH AVCO's ("DALLAH AVCO " or the "Company") attorneys that it is a defendant in civil lawsuits in the United States. I am submitting this declaration in support of DALLAH AVCO 's Motion to Dismiss for lack of personal jurisdiction in those cases.
3. I am employed by DALLAH AVCO (Presently DALLAH TRANS ARABIA CO. LTD.) and my current title is CHAIRMAN OF THE BOARD OF DIRECTORS.
4. Based on my experience within the Company, I have knowledge of DALLAH AVCO's international operations and connections to the United States. I have also reviewed all Company records known to me which might reveal any contact DALLAH AVCO has had with the United States.
5. DALLAH AVCO was a Saudi company in which AVCO OVERSEAS of the U.S.A. had held 15% of the shares of the Company. But the Company does not own any property or bank account or any presence and does not carry and never carried any activity at any time in the U.S.A.
6. DALLAH AVCO is not, and has never been, domiciled, organized, or incorporated in any form in the United States.



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7. DALLAH AVCO is not, and has never been, licensed or registered to do business in the United States.

8. DALLAH AVCO does not, and has never, owned or leased property in the United States.

9. DALLAH AVCO does not have, and never has had, a branch office, a representative, an employee or an agent in the United States, except for its representation by an attorney in this court.


10. DALLAH AVCO does not now, and has never, offered or advertised any activities or services within the United States.

11. DALLAH AVCO has never received funds which originated in the United States.

12. Shares of DALLAH AVCO stock have never been offered or sold in the United States.

13. AVCO's relationship with the Company was terminated in 1995 and the AVCO name was subsequently removed whereby the new name of the Company became DALLAH TRANS ARABIA CO. LTD.

I declare under penalty of law that the foregoing is true and correct.
Executed on this 6th day of March 2006.


_____/s/_____
Name: Mr. ALAWI M. SAEED KAMEL
Title: Chairman of the Board of Directors
